

**Exhibit 6:** New Pleadings and Evidence in MCLM Section 308 Proceeding and Section 309 Proceeding Since Last File in SCRRRA Proceeding: Reference and Incorporation of Petition to Deny File No. 0004354053 and its Exhibits and Attachments, which have been filed in the WT Docket No. 10-83, the Section 308 Proceeding and Section 309 proceeding regarding Auction No. 61.

Petitioners reference and incorporate herein in this opposition to the Motion all of their facts and arguments that are new to the instant proceeding from the following proceeding:

*Petition to Deny, or in the Alternative Section 1.41 Request*, filed by Environmental LLC et al. on September 8, 2010, regarding File No. 0004354053, an assignment from MCLM to DCP Midstream L.P. (the “DCP Petition”).

The DCP Petition was already filed in WT Docket No. 10-83 on October 13, 2010. The DCP Petition and its facts and arguments were also filed in the Section 308 proceeding and in the pending Section 309 petition proceeding against MCLM’s Form 601, File No. 0002303355, for Auction No. 61.

The DCP Petition contains numerous new facts that have been obtained since filing of the Petition against the Applications. The DCP Petition includes numerous court filings by Donald DePriest and MCLM that show Donald DePriest controls and owns MCLM; that MCT Corp. is majority-owned and controlled by Donald DePriest and thus it is an affiliate of MCLM (and that he and his wife have knowingly misrepresented his control and ownership in MCT Corp. to the FCC); that Sandra DePriest and Donald DePriest have joint tax returns (which is the opposition of having “separate economic lives” as they have told the FCC); that there are other undisclosed officers and interest holders in MCLM (e.g. John Reardon, Belinda Hudson, the “MC Group” of investors, Oliver Phillips); that the majority of Mr. DePriest’s income, per a filing by Oliver Phillips that refers to deposition testimony of Belinda Hudson, the Secretary and Treasurer of MCLM and Communications Investments, Inc., goes to pay for assets not in his name (which Petitioners have shown can only be the licenses of MCLM, including the License); that MCLM has illegally used its FCC licenses as collateral; that Donald DePriest has more debt than total

assets (see e.g. Goad court case filings, the Phillips court case filings, and the ADECA judgments against DePriest in the DCP Petition in its Attachments 001-009, in particular Attachments 002, 005, 006 and 007).

Many of these new facts further confirm that Sandra DePriest is not the sole controlling party in MCLM and may not even be a controlling party in MCLM, but that her husband to obtain a bidding credit at auction used her as a front. They also contradict what MCLM and the DePriests have been telling the FCC in this proceeding and the Section 308 Proceeding and the pending Section 309 proceeding for Auction No. 61. All of these new facts are sufficient by themselves to disqualify MCLM and the DePriests from Auction No. 61 and are cause for revocation of the License and all of MCLM's licenses and of the DePriests and MCLM as FCC licensees.